

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

HALEY IP LLC, §  
§  
Plaintiff, §  
§  
vs. § Civil Action No. 2:22-cv-00230-JRG-RSP  
§  
BRIDGESTONE AMERICAS, INC., d/b/a §  
AZUGA, INC. §  
§  
Defendant. §  
§  
§

**REPLY IN SUPPORT OF DEFENDANT AZUGA, INC.’S  
12(b)(3) and 12(b)(5) MOTION TO DISMISS OR TRANSFER VENUE**

Plaintiff Haley IP LLC (“Plaintiff”) filed no opposition to Azuga, Inc.’s (“Azuga”) 12(b)(3) and 12(b)(5) Motion to Dismiss or Transfer Venue [Doc. 10] (the “Motion”) within the time prescribed by the Court [Doc. 19]. Because Plaintiff did not timely file an opposition to the Motion, there is a presumption that Plaintiff does not controvert the facts set out by movant and has no evidence to offer in opposition to the motion. L.R. CV-7(d). Therefore, Azuga respectfully requests the Court dismiss Plaintiff’s claims against it based on improper service of process and/or improper venue, as described in the Motion.

Respectfully submitted,

*/s/ Jeffrey S. Patterson*

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**ATTORNEYS FOR DEFENDANT**

**AZUGA, INC.**

**CERTIFICATE OF SERVICE**

On the 30th day of September 2022, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Eastern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all parties pursuant to the Federal Rules of Civil Procedure.

*/s/ Jeffrey S. Patterson*